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7 Attorneys for Defendant

8 OLD REPUBLIC NATIONAL TITLE INSURANCE
COMPANY erroneously sued as OLD REPUBLIC NATIONAL
INSURANCE COMPANY

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 U.S. BANK TRUST, N.A., AS TRUSTEE
12 FOR LSF8 MASTER PARTICIPATION
TRUST,

13 Plaintiff,

14 vs.

15 OLD REPUBLIC NATIONAL INSURANCE
COMPANY,

16 Defendant.

17 Case No.: 2:19-cv-01136-APG-BNW

18 **STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
OLD REPUBLIC NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO COMPLAINT**

19 **(First Request)**

20 Plaintiff U.S. Bank Trust, N.A., as Trustee for LSF8 Master Participation Trust ("U.S.
21 Bank") and defendant Old Republic National Title Insurance Company ("Old Republic"), by and
22 through their counsel of record, hereby stipulate as follows:

23 **WHEREAS**, U.S. Bank filed its complaint in this matter on June 28, 2019 (ECF No. 1);

24 **WHEREAS**, U.S. Bank purported to serve the complaint upon Old Republic on October
25 9, 2019;

26 **WHEREAS**, Old Republic's response to the complaint is due October 30, 2019;

27 **WHEREAS**, U.S. Bank has agreed to extend Old Republic's time to respond to the
complaint to November 13, 2019; and

28 **WHEREAS**, this is the first stipulation for an extension of Old Republic's time to respond
to the complaint.

1 Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate
2 and agree as follows:

3 1. Old Republic shall respond to the complaint on or before November 13, 2019.
4 2. Old Republic intends to preserve its right and does not expressly waive any and all
5 defenses listed in Fed. R. Civ. P. 12(b), including by way of example only, and without limitation,
6 with respect to whether it is subject to personal jurisdiction in this forum, and with respect to
7 whether service of process of the complaint and summons were adequate.

8 Dated this 28th day of October 2019

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

10 /s/--*Kevin S. Sinclair*

11 By: _____
12 Kevin S. Sinclair, Esq.
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16 8716 Spanish Ridge Avenue, Suite 105
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18 Attorneys for Old Republic National Title Insurance
19 Company

20 Dated this 28th day of October 2019

21 WRIGHT, FINLAY & ZAK, LLP

22 /s/--*Lindsay D. Robbins*

23 By: _____
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29 Attorneys for U.S. Bank Trust, N.A., as Trustee for
30 LSF8 Master Participation Trust

31 **ORDER**

32 **IT IS SO ORDERED:**

33 Dated: 10/29/19

34 By: *Brenda Weksler*

35 BRENDAG WEKSLER
36 UNITED STATES MAGISTRATE JUDGE